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Filing date:

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91204409	
Party	Defendant Ali Kimiai	
Correspondence Address	KALAI L WINELAND PATENTIQUE PLLC PO BOX 50368 BELLEVUE, WA 98015 UNITED STATES docket@patentique.com	
Submission	Stipulated/Consent Motion to Extend	
Filer's Name	Kalai Wineland	
Filer's e-mail	docket@patentique.com	
Signature	/Kalai Lau Wineland/	
Date	09/17/2012	
Attachments	2012_09_17_Consent_Mot.pdf (3 pages)(525286 bytes)	

	by certify that this correspondence A with the United States Patent ar September 17, 2012	
PATE	NTIQUE PLLC	
Ву:	Kalai Wineland	Mulul

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

In the matter of Trademark Serial No. 85/281,884 Filed: March 30, 2011 Published: February 28, 2012 Mark: POMENADE	
POM WONDERFUL LLC Opposer,))) Opposition No. 91204409
V.	STIPULATED MOTION FOR EXTENSION OF TIME
KIMIAI, Ali, Applicant.)))

STIPULATED MOTION FOR EXTENSION OF DISCOVERY AND TRIAL DATES

Applicant Ali Kimiai, by and through his attorneys Patentique PLLC, hereby requests that the Trademark Trial and Appeal Board suspend proceedings in the above-entitled matter for a period of thirty (30) days from August 28, 2012, and that the deadlines associated with discovery and trial in this matter be extended as follows:

Proceedings Resume September 27, 2012

Initial Disclosures Due September 29, 2012

Expert Disclosures Due January 26, 2012

Discovery Closes February 25, 2013

Plaintiff's Pretrial Disclosures April 11, 2013

Plaintiff's 30-Day Trial Period Ends May 26, 2013

Defendant's Pretrial Disclosures June 10, 2013

Defendant's 30-Day Trial Period Ends July 25, 2013

Plaintiff's Rebuttal Disclosures August 9, 2013

Plaintiff's 15-Day Rebuttal Period Ends September 8, 2013

This motion is made in good faith and not for the purpose of unduly delaying proceedings in the Patent and Trademark Office. The parties are in settlement negotiations, and the extension is requested to allow the parties additional time for said negotiations, which if successful will avert the need for a continuation of these proceedings. The parties respectfully submit that this constitutes good cause for a grant of the instant motion and therefore request the same.

Danielle Criona, Esq., counsel for Plaintiff, granted consent to this motion for extension to the undersigned counsel in writing on September 6, 2012. A Certificate of Service accompanies this Stipulated Motion.

Respectfully submitted,

Kalai L. Wineland

Attorney for Applicant Ali Kimiai

Muled

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing STIPULATED MOTION FOR EXTENSION OF TIME has been served on counsel for Plaintiff, as consented via electronic mail to

Danielle Criona, Esq.
Intellectual Property Counsel
11444 West Olympic Blvd., 7th Floor
Los Angeles, CA 90064
dcriona@roll.com

Dated: Supt 17, 2012

Kalai L. Wineland

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